

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ELAINE DIGREGORIO : Case No. 07 CV 6566 (CLB) *Fee paid
\$25.00
E615882*

Plaintiff, : : **MOTION TO ADMIT COUNSEL**
: PRO HAC VICE

v. : : **U.S. DISTRICT COURT**
: **APR 22 2008**
: **J. OF N.Y. W.P.**

WHIRLPOOL CORPORATION : :
Defendant. : :
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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Rafael Vergara, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

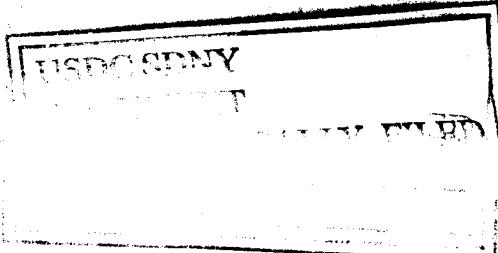
Applicant's Name: J. Michael Kvetan
 Firm Name: White and Williams, LLP
 Address: 1800 One Liberty Place
 City/State/Zip: Philadelphia, PA 19103
 Phone Number: 215-864-7114
 Fax Number: 215-789-7619

J. Michael Kvetan is a member in good standing of the Bar of the State of New Jersey and the Commonwealth of Pennsylvania. He is also admitted to practice before the United States District Courts for the Eastern and Middle Districts of Pennsylvania, and the District of New Jersey. Certificates of Good Standing are attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against J. Michael Kvetan in any State or Federal Court.

Date: August 16, 2007

Respectfully submitted,

By: *Rafael Vergara*
 Rafael Vergara (RV-4098)
 White and Williams LLP
 One Penn Plaza, Suite 1801
 New York, NY 10119
 Phone: (212) 244-9500
 Fax: (212) 631-4436
Attorneys for plaintiff Elaine DiGregorio



Supreme Court of New Jersey



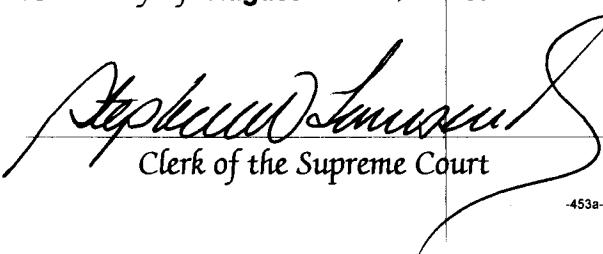
Certificate of Good Standing

This is to certify that **J MICHAEL KVETAN**
(No. **020391997**) was constituted and appointed an Attorney at Law of New Jersey on **March 18, 1998** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.

In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this 1ST day of August , 20 07


Stephen J. Munzer
Clerk of the Supreme Court



Supreme Court of Pennsylvania

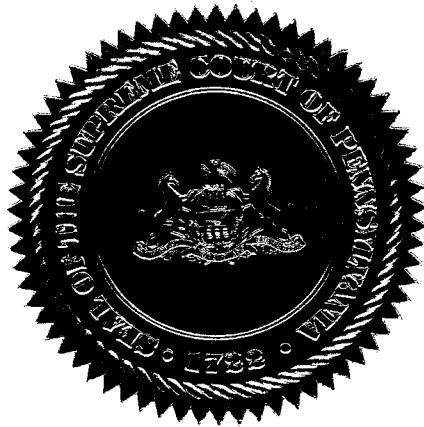
CERTIFICATE OF GOOD STANDING

J. Michael Kvetan, Esq.

DATE OF ADMISSION

November 13, 1997

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal
Dated: July 30, 2007



Patricia A. Johnson
Chief Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ELAINE DIGREGORIO : Case No. 07 CV 6566 (CLB)
Plaintiff, :
v. : **AFFIDAVIT OF RAFAEL
VERGARA IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**
WHIRLPOOL CORPORATION :
Defendant. :
----- X
State of New York)
) ss:
County of New York)

Rafael Vergara, being duly sworn, hereby deposes and says as follows:

1. I am an attorney with White and Williams LLP, counsel for plaintiff Elaine DiGregorio in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit J. Michael Kvetan as counsel *pro hac vice* to represent plaintiff Elaine DiGregorio in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in the State of New York in 2000. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court..

3. Mr. Kvetan is also an attorney with White and Williams, LLP. I have found Mr. Kvetan to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

4. Accordingly, I am pleased to move the admission of J. Michael Kvetan, *pro hac vice*.

5. I respectfully submit a proposed order granting the admission of J. Michael Kvetan, *pro hac vice*, which is attached hereto as **Exhibit A**.

WHEREFORE, it is respectfully requested that the motion to admit J. Michael Kvetan, *pro hac vice*, to represent plaintiff Elaine DiGregorio in the above captioned matter, be granted.

Respectfully submitted,

By: 
Rafael Vergara (RV-4098)

White and Williams LLP
One Penn Plaza, Suite 1801
New York, NY 10119
Phone: (212) 244-9500
Fax: (212) 631-4436

Attorneys for plaintiff Elaine DiGregorio

Sworn to and subscribed before me
on August 16, 2007.


NOTARY PUBLIC

SONGA L. RUCK
Notary Public, State of New York
No. 1RU6011556
Qualified in Kings County
Commission Expires August 10, 2010

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ELAINE DIGREGORIO : Case No. 07 CV 6566 (CLB)
v. :
Plaintiff, : **ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**
WHIRLPOOL CORPORATION :
Defendant. :
----- X

Upon the motion of Rafael Vergara, attorney for plaintiff Elaine DiGregorio, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: J. Michael Kvetan
Firm Name: White and Williams LLP
Address: 1800 One Liberty Place
City/State/Zip: Philadelphia, PA 19103
Phone Number: 215-864-7114
Fax Number: 215-789-7619

is admitted to practice *pro hac vice* as counsel for plaintiff Elaine DiGregorio in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
New York, NY

United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ELAINE DIGREGORIO : Case No. 07 CV 6566 (CLB)
:
Plaintiff, :
:
v. :
:
WHIRLPOOL CORPORATION :
:
Defendant. :
----- X

CERTIFICATE OF SERVICE

I, Rafael Vergara, hereby certify, under penalty of perjury, that on August 16, 2007, I will cause to be sent by FedEx the following with respect to a motion for the *pro hac vice* admission of J. Michael Kvetan: (1) **Motion to Admit Counsel Pro Hac Vice** (dated August 16, 2007); (2) **Affidavit of Rafael Vergara in Support of Motion to Admit Counsel Pro Hac Vice** (dated August 16, 2007); and (3) **a proposed form of order**. The motion will be sent to the following person:

S. Alyssa Young, Esq.
Leader & Berkon LLP
630 Third Avenue, 17th Floor
New York, NY 10017
(*Attorneys for Defendant Whirlpool Corporation*)

Date: August 16, 2007

Respectfully submitted,

By: 
Rafael Vergara (RV-4098)
White and Williams LLP
One Penn Plaza, Suite 1801
New York, NY 10119
Phone: (212) 244-9500
Fax: (212) 631-4436
Attorneys for plaintiff Elaine DiGregorio